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14
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

15 SHARON CROWDER, JOEL LUMIAN,
 16 ROBERT SMITH, AMANDA
 17 GOLDWASSER, and MARK ELKINS
 18 individually and on behalf of all others
 19 similarly situated,

20 *Plaintiffs,*

21 v.

22 THE SHADE STORE, LLC,

23 *Defendant.*

24 Case No. 5:23-cv-02331-NC

25 **STIPULATION AND [PROPOSED]**
ORDER FOR EXTENSION OF TIME TO
FILE (1) PLAINTIFFS' REPLY IN
SUPPORT OF MOTION FOR CLASS
CERTIFICATION; (2) PLAINTIFFS'
OPPOSITION TO MOTION TO
EXCLUDE THE TESTIMONY OF
PLAINTIFFS' EXPERTS;
(3) DEFENDANT'S REPLY IN SUPPORT
OF MOTION TO EXCLUDE THE
TESTIMONY OF PLAINTIFFS'
EXPERTS; (4) CONTINUANCE OF CASE
MANAGEMENT CONFERENCE;
(5) CONTINUANCE OF HEARING ON
DEFENDANT'S MOTION TO EXCLUDE
THE TESTIMONY OF PLAINTIFFS'
EXPERTS

1 Pursuant to Local Rule 6-2, Plaintiffs Sharon Crowder, Joel Lumian, Robert Smith, Amanda
2 Goldwasser, and Mark Elkins (“Plaintiffs”) and Defendant The Shade Store, LLC (“Defendant,” and
3 together with Plaintiffs, the “Parties”), by and through their respective counsel of record, stipulate as
4 follows:

5 WHEREAS, on March 24, 2025, Plaintiffs filed their Notice of Motion and Motion for Class
6 Certification (Dkt. 112);

7 WHEREAS, on March 25, 2025, the Court set the hearing on Plaintiffs’ Motion for Class
8 Certification for June 11, 2025, at 11:00 a.m. (Dkt. 114);

9 WHEREAS, the Court also scheduled a further Case Management Conference for June 11,
10 2025, at 11:00 a.m. (Dkt. 114);

11 WHEREAS, on April 28, 2025, Defendant filed its Opposition to Plaintiffs’ Motion for Class
12 Certification (Dkt. 121) and its Motion to Exclude the Testimony of Plaintiffs’ Experts (Dkt. 120)
13 (“Motion to Exclude”), which Defendant noticed for hearing on June 11, 2025, at 11:00 a.m.;

14 WHEREAS, on May 23, 2025, the Court granted the Parties’ Stipulation and Proposed Order
15 to extend the Parties’ time to file (1) Plaintiffs’ Reply in Support of Motion for Class Certification;
16 (2) Plaintiffs’ Opposition to Defendant’s Motion to Exclude; (3) Defendant’s Reply in Support of its
17 Motion to Exclude (Dkt. 141);

18 WHEREAS, on May 27, 2025, the Court granted the Parties’ Stipulation and Proposed Order
19 for Continuance of (1) Case Management Conference; and (2) the hearing on Defendant’s Motion to
20 Exclude the Testimony of Plaintiffs’ Experts (Dkt. 143);

21 WHEREAS, the existing deadlines and scheduled hearings are as follows:

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- 23 • June 17, 2025 – Plaintiffs’ Reply in Support of Motion for Class Certification and
Plaintiffs’ Opposition to Motion to Exclude;
- 24 • July 21, 2025 – Defendant’s Reply in Support of its Motion to Exclude;
- 25 • August 6, 2025, at 11:00 a.m. – Hearing on Plaintiffs’ Motion for Class
Certification, Hearing on Defendant’s Motion to Exclude, Case Management
Conference;

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1 WHEREAS, the Parties respectfully request a 30-day extension of these deadlines. The
 2 Parties request this extension because more time is needed to adequately brief Plaintiffs' Motion for
 3 Class Certification and Defendant's Motion to Exclude due to other obligations, especially including
 4 the birth and care of Plaintiffs' counsel's newborn child. In addition, the Parties have been discussing
 5 settlement and the extension will provide the Parties time to focus on a mutually agreeable resolution
 6 to the case.

7 WHEREAS, this is the Parties' second request to extend or continue these deadlines;

8 WHEREAS, the extension will not otherwise alter the date of any event or any deadline
 9 already fixed by Court order;

10 THE PARTIES STIPULATE AND REQUEST as follows:

- 11 1. Plaintiffs' Reply in Support of Motion for Class Certification and Opposition to
 Motion to Exclude shall be filed by July 17, 2025.
- 12 2. Defendant's Reply in Support of its Motion to Exclude the Testimony of Plaintiffs'
 Experts shall be filed by August 20, 2025.
- 13 3. The hearing on Plaintiffs' Motion for Class Certification, hearing on Defendant's
 Motion to Exclude, and Case Management Conference shall be continued to
 September 10, 2025, at 11:00 a.m.

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 19 Dated: June 11, 2025

Respectfully submitted,

20 By: /s/ Martin Brenner
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1 Dated: June 11, 2025

Respectfully submitted,

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21 *The Shade Store, LLC*

ATTESTATION OF COMPLIANCE

In compliance with Civil Local Rule 5-1(i)(3), I attest that all other counsel on whose behalf this filing is jointly submitted have approved of and concurred in this filing.

/s/ Martin Brenner
Martin Brenner

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**
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4 Dated: _____
5 Hon. Nathanael M. Cousins
6 UNITED STATES MAGISTRATE JUDGE
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